

LAW OFFICES OF ANDY S. OH, PLLC

andyohlegal@outlook.com

718.813.5025

By ECF

January 4, 2019

Hon. Vernon Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Great Western Ins. Co. v. Mark Graham et. al.* (No. 18-cv-6249 (VSB))
Request for Extension of Time to Answer or Move

Your Honor:

I represent Defendant Greg Tolaram and I just filed my notice of appearance on his behalf earlier today. Mr. Tolaram is the last-served defendant. I have just been retained as counsel and will require some time to get familiar Mr. Tolaram/s situation. In addition, Mr. Tolaram has experienced a personal loss of a very close family member.

On the current schedule, Mr. Tolaram's motion to dismiss and/or answer would be due tomorrow, February 5th. Given the circumstances I have described, however, counsel for Plaintiff Great Western has graciously agreed to extend Mr. Tolaram's time to respond to the complaint by 30 days (i.e., his time to respond would be extended to March 4, 2019). Counsel for Great Western, Gerard Kelly, and I have also agreed that the opposition and reply dates will not be affected by this 30 day extension. Thus, I respectfully request that the court approve and so-order this application for a 30-day extension on behalf of Greg Tolaram

Respectfully submitted,

/s/ Andy S. Oh
Andy S. Oh